

EDWARDS ANGELL PALMER & DODGE LLP

111 Huntington Avenue Boston, MA 02199 617.239.0100 fax 617.227.4420 eapdlaw.com

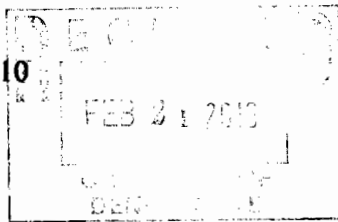
David G. Conlin

617.517.5515

fax 888.325.9129

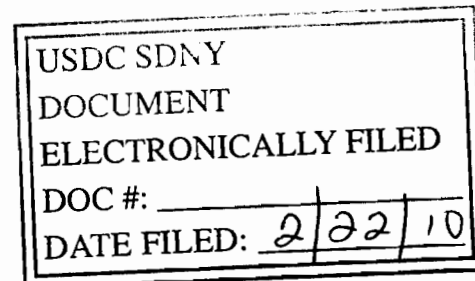
dconlin@eapdlaw.com

February 19, 2010



BY HAND

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, New York 10007



MEMO ENDORSED

Re: *Takeda Chemical Industries, Ltd., et al v. Ranbaxy Laboratories, Ltd., et al.*
Civil Action No. 03 CV 8250
Takeda Pharmaceutical Company Limited, et al. v. Mylan Laboratories, et al.
Civil Action No. 03 CV 8253, 08 CV 6999
Takeda Chemical Industries, Ltd., et al. v. Watson Pharmaceuticals, Inc., et al.
Civil Action No. 03 CV 8254
Takeda Pharmaceutical Company Limited, et al. v. Alphapharm PTY Ltd., et al.
Civil Action No. 04 CV 1966
Takeda Pharmaceutical Company Limited, et al. v. Sandoz, Inc.
Civil Action No. 07 CV 3844, 09 CV 5210 (S.D.N.Y.)
Takeda Pharmaceutical Company Limited, et al. v. Teva Pharmaceutical Industries Ltd., et al.
Civil Action No. 09 CV 4665
Takeda Pharmaceutical Company Limited, et al. v. Torrent Pharmaceutical Ltd., et al.
Civil Action No. 09 CV 6051

Dear Judge Cote:

We represent the Takeda plaintiffs in the above actions.

The parties jointly have been attempting to work out a revised schedule to complete discovery in the above actions, and have encountered some scheduling difficulties. The parties respectfully request that the Court consider modifying the current schedule as described below. The parties expect that any further modifications to the case schedule would not be necessary, and the proposed schedule would not involve changing the June 7, 2010 trial date.

If convenient to the Court, the parties propose that the Court amend the case schedule as set forth below, with an accompanying movement of the Pretrial Conference date to May 28, 2010:

EDWARDS ANGELL PALMER & DODGE LLP

Hon. Denise L. Cote
February 19, 2010
Page 2

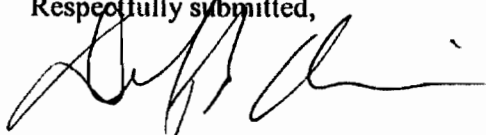
1. All fact discovery is to be completed by March 19, 2010;
2. Opening expert reports are to be served by March 26, 2010;
3. Responsive expert reports are to be served by April 16, 2010;
4. All expert discovery is to be completed by April 30, 2010;
5. Motions in limine due May 3, 2010;
6. Joint pretrial order due May 10, 2010;
7. Oppositions to motions in limine due on May 10, 2010; and
8. Replies to oppositions to motions in limine due on May 13, 2010.

The parties note that under the current schedule, the Pretrial Conference is set for May 7, 2010. The parties are hopeful that the proposed new date for the Pretrial Conference of May 28, 2010, prior to trial starting on June 7, 2010, is acceptable to the Court. If a May 28, 2010 Pre-Trial Conference is not acceptable to the Court, the parties will be happy to continue to work together, with any guidance from the Court, on an acceptable modification to the case schedule.

The parties believe that the foregoing modifications would be in the best interests of the cases, and all parties agree to the foregoing proposed modifications.

Thank you very much for your consideration.

Respectfully submitted,



David G. Conlin
Attorney for Plaintiffs
cc: All Counsel of Record

The parties may adjust discovery dates on consent, but the Pretrial Order remains due on 4/16 at noon, and the motions in limine remain due 4/12. The date for the May 7 conference may be moved. The Court will address the date for the 5/7 conference nearer to 4/12.
David G. Conlin
Feb. 22, 2010